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February 14, 2014

VIA ECF

Hon. Katherine B. Forrest
United States District Judge
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Courtroom 15A
New York, New York 10007-1312

Re: In re Puda Coal Securities Inc. et al. Litigation,
Civil Action No. 11-cv-2598 (KBF)

Your Honor:

Defendant MSPC, Certified Public Accountants and Advisors, PC (“MSPC”), sued herein as Moore Stephens, PC, requests, with the consent of Plaintiffs’ counsel, that the Court extend the deadline for MSPC to file its summary judgment motion with the court from today, February 14, 2014, until Monday, February 17, 2014, with filing of same with the Court under seal to be completed on February 18, 2014 when the Court reopens from the President’s Day holiday. MSPC further requests, with Plaintiffs’ consent, the following adjustment in the motion schedule as it relates between Plaintiffs and MSPC, to wit, that Plaintiffs’ time to file opposition papers to MSPC’s motion be extended from March 17, 2014 until March 20, 2014. No extension of time is requested with respect to MSPC’s time to file reply papers thereto on April 4, 2014.

No prior requests have been made by MSPC to extend discovery or filing deadlines herein. No request is made to adjust the filing deadlines with respect to any motion to be filed by defendant Moore Stephens Hong Kong (“MSHK”).

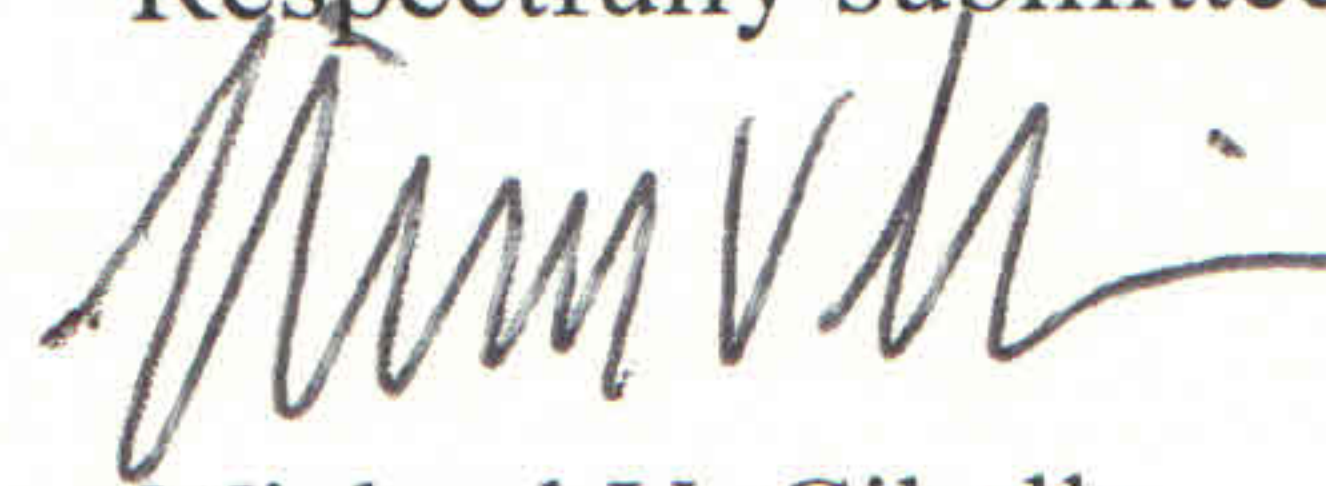
On October 22, 2013, the Court granted *Plaintiffs’* request to *extend* the close of fact discovery from November 21, 2013 to December 20, 2013. Thereafter, on November 6, 2013, the Court granted *defendant MSHK’s* proposal revising the previous motion and trial schedules in light of the extended discovery period previously granted by the Court, wherein motions for summary judgment were now due on February 14, 2014.

The reason MSPC is seeking this extension is that I am lead trial counsel in this matter and require additional time to complete our motion for summary judgment due to

the fact that I also became engaged on trial in a homicide case this week in New York State Supreme Court, Kings County, and as such, require the weekend to appropriately review and complete MSPC's motion for summary judgment due to my unavailability this week caused by my trial engagement. Notably, Plaintiffs consent to this requested adjustment in the motion schedule and all motions will still be fully submitted to the Court by April 4, 2014, as previously scheduled.

For the reasons set forth above, MSPC respectfully requests that the Court extend the deadline for MSPC to file its summary judgment motion with the court from today, February 14, 2014, until Monday, February 17, 2014, with filing of same with the Court under seal to be completed on February 18, 2014, and that Plaintiffs' time to file opposition papers to MSPC's motion be extended from March 17, 2014 until March 20, 2014.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "Michael V. Cibella", with a stylized flourish at the end.

Michael V. Cibella

cc: All Counsel of Record (via ECF)